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May 24, 2019

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Implementing Kari's Law and Section 506 of RAY BAUM'S Act*, PS Docket No. 18-261; *Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems*, PS Docket No. 17-239; *Misuse of Internet Protocol (IP) Captioned Telephone Service*, CG Docket No. 13-24

Dear Ms. Dortch:

This filing is a follow-up to the March 21, 2019 *ex parte* meeting between Sorenson Communications, LLC ("Sorenson") and CaptionCall, LLC ("CaptionCall") and representatives from the Consumer and Governmental Affairs Bureau ("CBG"), the Public Safety and Homeland Security Bureau ("PSHSB"), and the Office of the Managing Director regarding the Commission's September 26, 2018 Notice of Proposed Rulemaking.[1] In that meeting, Sorenson and CaptionCall expressed their concerns with the proposed rules and offered to submit proposed rule language that better reflects the differences between the two Telecommunications Relay Service ("TRS") services, as described in their Comments and the *ex parte*, and that implements the flexibility the Commission proposed for TRS in Paragraph 81 of the Kari's Law NPRM.[2] Sorenson's and CaptionCall's proposed rule language is enclosed as Exhibit 1, and a redline document showing the differences between these proposed rules and the draft rules released with the Kari's Law NPRM is enclosed as Exhibit 2.

Due to fundamental differences in the manner in which Video Relay Service ("VRS") and Internet Protocol Captioned Telephone Service ("IP CTS") are provided, and the different types of location information available to the respective providers, Sorenson and CaptionCall propose to separate the requirements for VRS from the requirements for IP CTS. This allows each service to be treated in an appropriate manner.

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1 Letter from John T. Nakahata, Counsel to Sorenson Communications, LLC and CaptionCall, LLC, to Marlene H. Dortch, Secretary, Federal Communications Commission, PS Docket No. 18-261, PS Docket No. 17-239 (filed Mar. 25, 2019) ("*Sorenson and CaptionCall Ex Parte*"); *Implementing Kari's Law and Section 506 of RAY BAUM'S Act and Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems*, Notice of Proposed Rulemaking, FCC No. 18-132, PS Docket Nos. 18-261 & 17-239, (rel. Sep. 26, 2018) ("*Kari's Law NPRM*").

2 *Sorenson and CaptionCall Ex Parte* at 6.

As proposed by Sorenson and CaptionCall, the rules require that the dispatchable location be provided to the Public Service Answering Point ("PSAP") when it is available but permit the use of automatic geolocation when the dispatchable location is unavailable, which will be necessary for mobile applications that receive location information from the device. As contemplated by Paragraph 81 of the Kari's Law NPRM,[3] if neither a dispatchable location nor geolocation information is available, the TRS provider can provide the Registered Location.[4] The proposed rules also make it clear that a VRS or IP CTS provider can utilize a back-up call center when the provider is not confident that it can otherwise reliably identify the caller's location. In addition, with respect to IP CTS, because the ability of web/wireless IP CTS applications to provide information other than Registered Location is dependent upon the capabilities of underlying nomadic or mobile VoIP providers, the draft proposes to sequence the implementation date for these IP CTS application to one year after the implementation deadline for nomadic or mobile VoIP.

Finally, for convenience, the proposed rules also incorporate the changes proposed in Commission's February 15, 2019 Further Notice of Proposed Rulemaking with respect to emergency call handling requirement for IP CTS providers.[5]

Sincerely,

John T. Nakahata
Counsel to Sorenson Communications, LLC and CaptionCall, LLC

cc: Ken Carlberg
Erika Olsen
John Evanoff
Nellie Foosaner
Bob Aldrich
Eliot Greenwald
David Schmidt
Michael Scott

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3 *Kari's Law NPRM* ¶ 81.

4 In order to implement Paragraph 81 of the NPRM, a change to the definition of Registered Location is also required, as it may not meet the real-time requirement of the dispatchable location definition.

5 *Misuse of Internet Protocol (IP) Captioned Telephone Service*, Report and Order, Further Notice of Proposed Rulemaking, and Order, FCC 19-11, CG Docket Nos. 13-24 & 03-123, (rel. Feb. 15, 2019).

Exhibit 1

Sorenson and CaptionCall Revised Draft E911 Location Rules

Subpart A

§9.3 Definitions.

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Registered Internet-based TRS user. An individual that has registered with an Internet-based TRS provider as described in § 64.611.

Registered Location. *Before February 16, 2020*: The most recent information obtained by a provider of interconnected VoIP service or telecommunications relay services (TRS), as applicable, that identifies the physical location of an end user. *On or after February 16, 2020*: The most recent information obtained by a provider of interconnected VoIP service or 911 VoIP service, as applicable, that identifies the dispatchable location of an end user. For telecommunications relay services (TRS), the most recent information obtained by a provider of TRS that identifies the physical location of an end user.

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Subpart E – Telecommunications Relay Services for Persons With Disabilities

§9.13 Jurisdiction.

Any violation of this subpart E by any common carrier engaged in intrastate communication shall be subject to the same remedies, penalties, and procedures as are applicable to a violation of the Act by a common carrier engaged in interstate communication. For purposes of this subpart, all regulations and requirements applicable to common carriers shall also be applicable to providers of interconnected VoIP service as defined in § 9.2.

§9.14 Emergency calling requirements.

(a) *Emergency call handling requirements for TTY-based TRS providers*.

(1) *Before February 16, 2020*. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

(2) *On or after February 16, 2020*. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP) and transmits the caller's dispatchable location to the PSAP. An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

(b) *Additional emergency calling requirements applicable to internet-based TRS providers.*

(1) Each provider of Internet-based TRS shall:

(i) When responsible for placing or routing of a voice call to the public switched telephone network, accept and handle emergency calls and access, either directly or via a third party, a commercially available database that will allow the provider to determine an appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority that corresponds to the caller's location, and to relay the call to that entity;

(ii) Provide 911 and E911 service in accordance with subsection (c)-(e) of this section, as applicable.

(iii) Implement a system that ensures that the provider answers an incoming emergency call before other non-emergency calls (*i.e.*, prioritize emergency calls and move them to the top of the queue); and

(iv) Ensure that information obtained as a result of this section is limited to that needed to facilitate 911 services, is made available only to emergency call handlers and emergency response or law enforcement personnel, and is used for the sole purpose of ascertaining a user's location in an emergency situation or for other emergency or law enforcement purposes.

(c) *E911 Service for VRS and IP Relay before February 16, 2020*.

(1) *Scope*. The following requirements are only applicable to providers of VRS or IP Relay. Further, the following requirements apply only to 911 calls placed before February 16, 2020 by registered users whose Registered Location is in a geographic area served by a Wireline E911 Network and is available to the provider handling the call.

(2) *E911 Service*.

(i) VRS or IP Relay providers must, as a condition of providing service to a user, provide that user with E911 service as described in this section;

(ii) Request, at the beginning of each emergency call, the caller's name and location information, unless the VRS or IP Relay provider already has, or has access to, geolocation or a Registered Location for the caller;

(iii) VRS or IP Relay providers must transmit all 911 calls, as well as ANI, the caller's Registered Location, the name of the VRS or IP Relay provider, and the CA's identification number for each call, to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's Registered Location and that has been designated for telecommunications carriers pursuant to §9.4 of this chapter, provided that "all 911 calls" is defined as "any communication initiated by an VRS or IP Relay user dialing 911";

(iv) All 911 calls must be routed through the use of ANI and, if necessary, pseudo-ANI, via the dedicated Wireline E911 Network; provided that nothing in this subparagraph shall preclude routing the call first to a call center to ascertain the caller's location in the event that the VRS or IP Relay provider believes the caller may not be located at the Registered Location, and

(v) The Registered Location, the name of the VRS or IP Relay provider, and the CA's identification number must be available to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority from or through the appropriate automatic location information (ALI) database.

(3) *Service level obligation*. Notwithstanding the provisions in paragraph (c)(2) of this section, if a PSAP, designated statewide default answering point, or appropriate local emergency authority is not capable of receiving and processing either ANI or location information, a VRS or IP Relay provider need not provide such ANI or location information; however, nothing in this paragraph affects the obligation under paragraph (c)(2)(iii) of this section of a VRS or IP Relay provider to transmit via the Wireline E911 Network all 911 calls to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's Registered Location and that has been designated for telecommunications carriers pursuant to §64.3001 of this chapter.

(4) *Registered location requirement*. As of December 31, 2008, VRS and IP Relay providers must:

(i) Obtain from each Registered Internet-based TRS User, prior to the initiation of service, the physical location at which the service will first be used; and

(ii) If the VRS or IP Relay is capable of being used from more than one location, provide their registered Internet-based TRS users one or more methods of updating their Registered Location, including at least one option that requires use only of the iTRS access technology necessary to access the VRS or IP Relay. Any method used must allow a registered Internet-based TRS user to update the Registered Location at will and in a timely manner.

(d) *E911 Service for VRS and IP Relay on or after February 16, 2020*.

(1) *Scope*. The following requirements are only applicable to providers of VRS or IP Relay. Further, the following requirements apply only to 911 calls placed on or after February 16, 2020 by registered users whose dispatchable location is in a geographic area served by a Wireline E911 Network and is available to the provider handling the call.

(2) *E911 Service.*

(i) VRS or IP Relay providers must, as a condition of providing service to a user, provide that user with E911 service as described in this section;

(ii) Request, at the beginning of each emergency call, the caller's name and dispatchable location, unless the VRS or IP Relay provider already has, or has access to, geolocation or a dispatchable location for the caller;

(ii) VRS or IP Relay providers must transmit all 911 calls to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's dispatchable location and that has been designated for telecommunications carriers pursuant to §9.4 of this chapter, provided that "all 911 calls" is defined as "any communication initiated by an VRS or IP Relay user dialing 911", and shall transmit or provide with the call ANI, the name of the VRS or IP Relay Provider, the CA's identification number for each call, and the following:

(A) Dispatchable location, if available;
(B) Automatically determined geolocation coordinates, if dispatchable location is not available;
(C) Registered Location, if dispatchable location or automatically determined geolocation coordinates are not available or not deemed to be sufficiently reliable.

(iii) All 911 calls must be routed through the use of ANI and, if necessary, pseudo-ANI, via the dedicated Wireline E911 Network; provided that nothing in this subparagraph shall preclude routing the call first to a call center to ascertain the caller's location in the event that the VRS or IP Relay provider believes the caller may not be located at the Registered Location, and

(iv) The location information, the name of the VRS or IP Relay provider, and the CA's identification number must be available to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority from or through the appropriate automatic location information (ALI) database.

(3) *Service level obligation*. Notwithstanding the provisions in paragraph (d)(2) of this section, if a PSAP, designated statewide default answering point, or appropriate local emergency authority is not capable of receiving and processing either ANI or location information, a VRS or IP Relay provider need not provide such ANI or location information; however, nothing in this paragraph affects the obligation under paragraph (d)(2)(iii) of this section of a VRS or IP Relay provider to transmit via the Wireline E911 Network all 911 calls to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's dispatchable location and that has been designated for telecommunications carriers pursuant to §9.4 of this chapter.

(4) *Dispatchable location requirement*. VRS and IP Relay providers must comply with either subparagraph (i) or (ii) below.

(i) (A) Obtain from each Registered Internet-based TRS User, prior to the initiation of service, the Registered Location at which the service will first be used; this Registered Location must be sufficiently detailed to be a dispatchable location; and

(B) (i) If the VRS or IP Relay is capable of being used from more than one location, provide their registered Internet-based TRS users one or more methods of updating their Registered Location, including at least one option that requires use only of the Internet-based TRS access technology necessary to access the VRS or IP Relay. Any method used must allow a registered Internet-based TRS user to update the Registered Location at will and in a timely manner; or (ii) Obtain the Registered Internet-based TRS User's current location at the time they initiate a 911 call without requiring additional action by the Registered Internet-based TRS User; and

(C) If the VRS or IP Relay is capable of being used from more than one location, and it is not possible to determine the caller's location at the time of the initiation of an emergency call, verify the current location with the TRS User at the beginning of an emergency call.

(e) *E911 Service for IP CTS on or after February 16, 2020*.

(1) *Scope*. The following requirements are only applicable to providers of IP CTS to the extent that the IP CTS provider, itself or through an entity with whom the IP CTS provider contracts, places or routes voice calls to the Public Switched Telephone Network ("Covered IP CTS Providers"). Further, the following requirements apply only to 911 calls placed on or after February 16, 2020 by a registered user whose dispatchable location is in a geographic area served by a Wireline E911 Network and is available to the provider handling the call.

(2) *E911 Service.*

(i) Covered IP CTS Providers must, as a condition of providing service to a user, provide that user with E911 service as described in this section;

(ii) Covered IP CTS Providers must transmit or provide (*1*) all 911 calls to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's dispatchable location and that has been designated for telecommunications carriers pursuant to § 9.4 of this chapter, provided that "all 911 calls" is defined as "any communication initiated by an IP CTS user dialing 911"; (*2*) with the call, a telephone number that is assigned to the caller and that enables the PSAP, designated statewide default answering point, or appropriate local emergency authority to call the 911 caller back directly, while enabling the caller to receive captions on the callback; and (*3*) the following location information:

(A) Dispatchable location, if available;
(B) Automatically determined geolocation coordinates, if dispatchable location is not available; or
(C) Registered Location, if dispatchable location or automatically determined geolocation coordinates are not available or not deemed by the Covered IP CTS Provider to be sufficiently reliable.
(D) The requirements under items (A) and (B) above shall be effective one year after the date all the requirements in Section 9.11(b)(4) are in effect for interconnected VoIP service or 911 VoIP service that is capable of being used from more than one location,

(iii) All 911 calls must be routed through the use of ANI and, if necessary, pseudo-ANI, via the dedicated Wireline E911 Network; provided that nothing in this subparagraph shall preclude routing the call first to a call center to ascertain the caller's location in the event that the Covered IP CTS provider believes the caller may not be located at the Registered Location, and

(iv) The location information, and callback number must be available to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority from or through the appropriate automatic location information (ALI) database.

(3) *Service level obligation*. Notwithstanding the provisions in paragraph (d)(2) of this section, if a PSAP, designated statewide default answering point, or appropriate local emergency authority is not capable of receiving and processing either ANI or location information, a Covered IP CTS provider need not provide such ANI or location information; however, nothing in this paragraph affects the obligation under paragraph

(d)(2)(iii) of this section of a Covered IP CTS provider to transmit via the Wireline E911 Network all 911 calls to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's dispatchable location and that has been designated for telecommunications carriers pursuant to §9.4 of this chapter.

(4) *Dispatchable location requirement*. Covered IP CTS providers must comply with either subparagraph (i) or (ii) below.

(i) (A) Obtain from each Registered IP CTS User of a Covered IP CTS service, prior to the initiation of service, the Registered Location at which the service will first be used; this Registered Location must be sufficiently detailed to be a dispatchable location; and

(B) If the IP CTS is capable of being used from more than one location, provide their Registered IP CTS users one or more methods of updating their Registered Location, including at least one option that requires use only of the Internet-based TRS access technology necessary to access the IP CTS. Any method used must allow a registered Internet-based TRS user to update the Registered Location at will and in a timely manner; or

(ii) Obtain the Registered Covered IP CTS User's current location at the time they initiate a 911 call without requiring additional action by the Covered IP CTS User.

Exhibit 2

Sorenson and CaptionCall Revised Draft E911 Location Rules Compared to FCC Proposed Rules

Subpart A

§9.3 Definitions.

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Registered Internet-based TRS user. An individual that has registered with ~~a VRS or IP Relay~~an Internet-based TRS provider as described in § 64.611.

Registered Location. *Before February 16, 2020*: The most recent information obtained by a provider of interconnected VoIP service or telecommunications relay services (TRS), as applicable, that identifies the physical location of an end user. *On or after February 16, 2020*: The most recent information obtained by a provider of interconnected VoIP service~~,~~ or 911 VoIP service, ~~or telecommunications relay services (TRS),~~ as applicable, that identifies the dispatchable location of an end user. For telecommunications relay services (TRS), the most recent information obtained by a provider of TRS that identifies the physical location of an end user.

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Subpart E – Telecommunications Relay Services for Persons With Disabilities

§9.13 Jurisdiction.

Any violation of this subpart E by any common carrier engaged in intrastate communication shall be subject to the same remedies, penalties, and procedures as are applicable to a violation of the Act by a common carrier engaged in interstate communication. For purposes of this subpart, all regulations and requirements applicable to common carriers shall also be applicable to providers of interconnected VoIP service as defined in § 9.2.

§9.14 Emergency calling requirements.

~~–~~(a) *Emergency call handling requirements for TTY-based TRS providers*.

(1) *Before February 16, 2020*. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP). An appropriate PSAP is either a PSAP that the caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

(2) *On or after February 16, 2020*. TTY-based TRS providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate Public Safety Answering Point (PSAP) and transmits the caller's dispatchable location to the PSAP. An appropriate PSAP is either a PSAP that the

caller would have reached if he had dialed 911 directly, or a PSAP that is capable of enabling the dispatch of emergency services to the caller in an expeditious manner.

(b) *Additional emergency calling requirements applicable to internet-based TRS providers.*

~~(1) As of December 31, 2008, the requirements of paragraphs (b)(2)(i) and (b)(2)(v) of this section shall not apply to providers of VRS and IP Relay to which §§9.14(c) and 9.14(d) apply.~~

~~(2~~(1) Each provider of Internet-based TRS shall:

~~(i) Accept~~(i) When responsible for placing or routing of a voice call to the public switched telephone network, accept and handle emergency calls and access, either directly or via a third party, a commercially available database that will allow the provider to determine an appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority that corresponds to the caller's location, and to relay the call to that entity;

~~(ii~~(ii) Provide 911 and E911 service in accordance with subsection (c)-(e) of this section, as applicable.

(iii) Implement a system that ensures that the provider answers an incoming emergency call before other non-emergency calls (*i.e.*, prioritize emergency calls and move them to the top of the queue); and

~~(iii) *Before February 16, 2020*. Request, at the beginning of each emergency call, the caller's name and location information, unless the Internet-based TRS provider already has, or has access to, a Registered Location for the caller;~~

~~(iv) *On or after February 16, 2020*. Request, at the beginning of each emergency call, the caller's name and dispatchable location, unless the Internet-based TRS provider already has, or has access to, a dispatchable location for the caller;~~

~~(v) Deliver to the PSAP, designated statewide default answering point, or appropriate local emergency authority, at the outset of the outbound leg of an emergency call, at a minimum, the name of the relay user and location of the emergency, as well as the name of the relay provider, the CA's callback number, and the CA's identification number, thereby enabling the PSAP, designated statewide default answering point, or appropriate local emergency authority to re-establish contact with the CA in the event the call is disconnected;~~

~~(vi) In the event one or both legs of an emergency call are disconnected (*i.e.*, either the call between the TRS user and the CA, or the outbound voice telephone call between the CA and the PSAP, designated statewide default answering point, or appropriate local emergency authority), immediately re-establish contact with the TRS user and/or the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority and resume handling the call; and~~

~~(vii~~(iv) Ensure that information obtained as a result of this section is limited to that needed to facilitate 911 services, is made available only to emergency call handlers and emergency response or law enforcement personnel, and is used for the sole purpose of ascertaining a user's location in an emergency situation or for other emergency or law enforcement purposes.

–(c) *E911 Service for VRS and IP Relay before February 16, 2020*.

(1) *Scope*. The following requirements are only applicable to providers of VRS or IP Relay. Further, the following requirements apply only to 911 calls placed before February 16, 2020 by registered users whose Registered Location is in a geographic area served by a Wireline E911 Network and is available to the provider handling the call.

(2) *E911 Service*.

(i) VRS or IP Relay providers must, as a condition of providing service to a user, provide that user with E911 service as described in this section;

(~~ii~~(ii) Request, at the beginning of each emergency call, the caller's name and location information, unless the VRS or IP Relay provider already has, or has access to, geolocation or a Registered Location for the caller;

(iii) VRS or IP Relay providers must transmit all 911 calls, as well as ANI, the caller's Registered Location, the name of the VRS or IP Relay provider, and the CA's identification number for each call, to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's Registered Location and that has been designated for telecommunications carriers pursuant to §9.4 of this chapter, provided that "all 911 calls" is defined as "any communication initiated by an VRS or IP Relay user dialing 911";

(~~iii~~iv) All 911 calls must be routed through the use of ANI and, if necessary, pseudo-ANI, via the dedicated Wireline E911 Network; ~~and~~provided that nothing in this subparagraph shall preclude routing the call first to a call center to ascertain the caller's location in the event that the VRS or IP Relay provider believes the caller may not be located at the Registered Location, and

(~~iv~~v) The Registered Location, the name of the VRS or IP Relay provider, and the CA's identification number must be available to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority from or through the appropriate automatic location information (ALI) database.

(3) *Service level obligation*. Notwithstanding the provisions in paragraph (c)(2) of this section, if a PSAP, designated statewide default answering point, or appropriate local emergency authority is not capable of receiving and processing either ANI or location information, a VRS or IP Relay provider need not provide such ANI or location information; however, nothing in this paragraph affects the obligation under paragraph (c)(2)(iii) of this section of a VRS or IP Relay provider to transmit via the Wireline E911 Network all 911 calls to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's Registered Location and that has been designated for telecommunications carriers pursuant to §64.3001 of this chapter.

(4) *Registered location requirement*. As of December 31, 2008, VRS and IP Relay providers must:

(i) Obtain from each Registered Internet-based TRS User, prior to the initiation of service, the physical location at which the service will first be used; and

(ii) If the VRS or IP Relay is capable of being used from more than one location, provide their registered Internet-based TRS users one or more methods of updating their Registered Location, including at least one option that requires use only of the iTRS access technology necessary to access the VRS or IP Relay. Any method used must allow a registered Internet-based TRS user to update the Registered Location at will and in a timely manner.

(d) *E911 Service for VRS and IP Relay on or after February 16, 2020.*

(1) *Scope*. The following requirements are only applicable to providers of VRS or IP Relay. Further, the following requirements apply only to 911 calls placed on or after February 16, 2020 by registered users whose dispatchable location is in a geographic area served by a Wireline E911 Network and is available to the provider handling the call.

(2) *E911 Service.*

(i) VRS or IP Relay providers must, as a condition of providing service to a user, provide that user with E911 service as described in this section;

~~(ii) VRS or IP Relay providers must transmit all 911 calls, as well as ANI,~~(ii) Request, at the beginning of each emergency call, the caller's name and dispatchable location, ~~the name of~~unless the VRS or IP Relay provider~~, and~~ already has, or has access to, geolocation or a dispatchable location for the ~~CA's identification number for each call,~~caller;

(ii) VRS or IP Relay providers must transmit all 911 calls to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's dispatchable location and that has been designated for telecommunications carriers pursuant to §9.4 of this chapter, provided that "all 911 calls" is defined as "any communication initiated by an VRS or IP Relay user dialing 911~~";~~", and shall transmit or provide with the call ANI, the name of the VRS or IP Relay Provider, the CA's identification number for each call, and the following:

(A) Dispatchable location, if available;
(B) Automatically determined geolocation coordinates, if dispatchable location is not available;
(C) Registered Location, if dispatchable location or automatically determined geolocation coordinates are not available or not deemed to be sufficiently reliable.

(iii) All 911 calls must be routed through the use of ANI and, if necessary, pseudo-ANI, via the dedicated Wireline E911 Network; ~~and~~provided that nothing in this subparagraph shall preclude routing the call first to a call center to ascertain the caller's location in the event that the VRS or IP Relay provider believes the caller may not be located at the Registered Location, and

(iv) The ~~dispatchable~~ location information, the name of the VRS or IP Relay provider, and the CA's identification number must be available to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority from or through the appropriate automatic location information (ALI) database.

(3) *Service level obligation*. Notwithstanding the provisions in paragraph (d)(2) of this section, if a PSAP, designated statewide default answering point, or appropriate local emergency authority is not capable of receiving and processing either ANI or location information, a VRS or IP Relay provider need not provide such ANI or location information; however, nothing in this paragraph affects the obligation under paragraph (d)(2)(iii) of this section of a VRS or IP Relay provider to transmit via the Wireline E911 Network all 911 calls to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's dispatchable location and that has been designated for telecommunications carriers pursuant to §9.4 of this chapter.

(4) *Dispatchable location requirement*. VRS and IP Relay providers must comply with either subparagraph (i) or (ii) below.

(i) (A) Obtain from each Registered Internet-based TRS User, prior to the initiation of service, the Registered Location at which the service will first be used; ~~and~~this Registered Location must be sufficiently detailed to be a dispatchable location; and

(B) (i) If the VRS or IP Relay is capable of being used from more than one location, provide their registered Internet-based TRS users one or more methods of updating their Registered Location, including at least one option that requires use only of the Internet-based TRS access technology necessary to access the VRS or IP Relay. Any method used must allow a registered Internet-based TRS user to update the Registered Location at will and in a timely manner; ~~and~~

~~(C) If the VRS~~ or ~~IP Relay is capable of being used from more than one location, identify whether the service is being used from a different location than the Registered Location, and if so, either:~~

~~(*1*) prompt the Registered Internet-based TRS User to provide a new Registered Location; or~~

~~(*2*) update the Registered Location without requiring additional action by the Registered Internet-based TRS User.~~

(ii) Obtain the Registered Internet-based TRS User's ~~dispatchable~~current location at the time they initiate a 911 call without requiring additional action by the Registered Internet-based TRS User~~.~~; and

(C) If the VRS or IP Relay is capable of being used from more than one location, and it is not possible to determine the caller's location at the time of the initiation of an emergency call, verify the current location with the TRS User at the beginning of an emergency call.

(e) *E911 Service for IP CTS on or after February 16, 2020.*

(1) *Scope*. The following requirements are only applicable to providers of IP CTS to the extent that the IP CTS provider, itself or through an entity with whom the IP CTS provider contracts, places or routes voice calls to the Public Switched Telephone Network ("Covered IP CTS Providers"). Further, the following requirements apply only to 911 calls placed on or after February 16, 2020 by a registered user whose dispatchable

location is in a geographic area served by a Wireline E911 Network and is available to the provider handling the call.

(2) *E911 Service.*

(i) Covered IP CTS Providers must, as a condition of providing service to a user, provide that user with E911 service as described in this section;

(ii) Covered IP CTS Providers must transmit or provide (*1*) all 911 calls to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's dispatchable location and that has been designated for telecommunications carriers pursuant to § 9.4 of this chapter, provided that "all 911 calls" is defined as "any communication initiated by an IP CTS user dialing 911"; (*2*) with the call, a telephone number that is assigned to the caller and that enables the PSAP, designated statewide default answering point, or appropriate local emergency authority to call the 911 caller back directly, while enabling the caller to receive captions on the callback; and (*3*) the following location information:

(A) Dispatchable location, if available;
(B) Automatically determined geolocation coordinates, if dispatchable location is not available; or
(C) Registered Location, if dispatchable location or automatically determined geolocation coordinates are not available or not deemed by the Covered IP CTS Provider to be sufficiently reliable.
(D) The requirements under items (A) and (B) above shall be effective one year after the date all the requirements in Section 9.11(b)(4) are in effect for interconnected VoIP service or 911 VoIP service that is capable of being used from more than one location,

(iii) All 911 calls must be routed through the use of ANI and, if necessary, pseudo-ANI, via the dedicated Wireline E911 Network; provided that nothing in this subparagraph shall preclude routing the call first to a call center to ascertain the caller's location in the event that the Covered IP CTS provider believes the caller may not be located at the Registered Location, and

(iv) The location information, and callback number must be available to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority from or through the appropriate automatic location information (ALI) database.

(3) *Service level obligation*. Notwithstanding the provisions in paragraph (d)(2) of this section, if a PSAP, designated statewide default answering point, or appropriate local emergency authority is not capable of receiving and processing either ANI or location information, a Covered IP CTS provider need not provide such ANI or location information; however, nothing in this paragraph affects the obligation under paragraph (d)(2)(iii) of this section of a Covered IP CTS provider to transmit via the Wireline E911 Network all 911 calls to the PSAP, designated statewide default answering point, or appropriate local emergency authority that serves the caller's dispatchable location and that has been designated for telecommunications carriers pursuant to §9.4 of this chapter.

(4) *Dispatchable location requirement*. Covered IP CTS providers must comply with either subparagraph (i) or (ii) below.

(i) (A) Obtain from each Registered IP CTS User of a Covered IP CTS service, prior to the initiation of service, the Registered Location at which the service will first be used; this Registered Location must be sufficiently detailed to be a dispatchable location; and

(B) If the IP CTS is capable of being used from more than one location, provide their Registered IP CTS users one or more methods of updating their Registered Location, including at least one option that requires use only of the Internet-based TRS access technology necessary to access the IP CTS. Any method used must allow a registered Internet-based TRS user to update the Registered Location at will and in a timely manner; or

(ii) Obtain the Registered Covered IP CTS User's current location at the time they initiate a 911 call without requiring additional action by the Covered IP CTS User.